

Evan Frank

From: Evan Frank
Sent: Friday, October 1, 2021 5:44 PM
To: Trevor C. Serine, Esq.
Subject: RE: AC2T v. Purrington - Discovery

Why have you ignored all my correspondence about this the past eight months?

From your e-mail: "once the pleadings stage is closed ..."
The pleadings are in fact already closed.

You know the second RPD's haven't been responded to, since I keep telling you in writing and I keep resending them to you and asking why you haven't responded:

September 29, 2021 e-mail: "Defense has still ... not produced the documents, and has not served responses."

August 24, 2021 letter: "Document requests (Exhibit A), which are 6 months overdue. ... the Defendant has not responded, has not served objections, and has not produced the documents themselves."

August 16, 2021 e-mail to you: "... provide responses to these document requests." This e-mail literally attached the unanswered RPD's, directed your attention to them, and asked why you weren't answering.

June 23 e-mail to you, again attaching the document requests themselves and asking you to respond: "I'm attaching them again ..."

From: Trevor C. Serine, Esq. <TCS@Serinelaw.com>
Sent: Friday, October 1, 2021 4:52 PM
To: Evan Frank <EFrank@alflaw.net>
Subject: AC2T v. Purrington - Discovery

Good afternoon Evan:

As previously indicated, once the pleadings stage is closed, we can discuss the depositions of the parties. It makes little sense to conduct depositions while the counts or areas of inquiry are still subject to modification.

Further, it is my understanding and information that prior counsel at Klehr Harrison prepared and supplied to your firm the Defendant's responses & objections to Interrogatories etc., sometime around September or October of 2020. If that is not the case, kindly let me know the status. Additionally, if you would like to schedule a confer, let me know.

Thank you,

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